

### **REMARKS**

By this amendment, Applicants propose to amend claims 1, 21 and 37, and cancel claims 4, 24 and 40. Upon entry of this Amendment, claims 1, 2, 5-11, 13-22, 25-29, 31-33, 37, 38, 41-47 and 49-53 will remain pending in this Application.

In the Final Office Action, the Examiner rejected claims 1, 2, 4-11, 13-22, 24-29, 31-33, 37, 38, 40-47 and 49-53 are rejected under 35 U.S.C. § 102(b) as being anticipated by Mitchell et al. (U.S. Patent No. 5,872,973). Applicants respectfully traverse the Examiner's rejection because Mitchell et al. fails to support the Examiner's rejection of these claims.

#### ***Claims 1, 21 and 37***

In the rejection of claims 1, 21 and 37, the Examiner continues to assert that Mitchell et al. teaches:

a first [Patron Object 102] and second instance [Patron Object 106] and an association [103 ('mapper' or 'mapping object')]

creating, for the first instance [e.g., 102], a reverse link [Probe] that defines a relationship between the first instance and the association [See Figs. 1-2 & Column 8, lines 10-32] wherein the instance [e.g. 102 or 106] is associated with a first wrapper [EosConnection (See Column 16, lines 10-26)] defining the reverse link; and

determining a relationship between the first and second instances based on the reverse link [See Appendix C and Column 14].

*Final Office Action*, p. 3, l. 2-10 (square-bracketed material in original).

However, as explained in the Amendment filed January 5, 2005, Mitchell et al. does not determine a relationship between instances of the patron objects, as asserted by the Examiner. In fact, Mitchell et al. specifies that “[t]he mapper [103] is never referenced or visible to ... the patron objects” (see col. 9, ll. 15-16), and “the [patron] object has no knowledge of which objects (if any) have placed [the] probes” (see col. 31, ll. 36-37). Rather than determining a relationship between *instances* of the patron object, the probes of Mitchell et al. “are callback functions that are invoked when data (typically in an object field) change.” Col. 30, ll. 52-57.

Moreover, while the EosConnection described by Mitchell et al. is described as a “wrapper” (Mitchell et al., col. 16, l. 11), it is not a wrapper “defining” *the probe* (which the Examiner alleges to read on the reverse link recited in claims 1, 21 and 37). Instead, it is “a simple wrapper around *the RPC calls used in the network connection.*” *Id.* (emphasis added).

Notwithstanding the above arguments, Applicants propose to amend claims 1, 21 and 37 to incorporate the recitations of claims 4, 24 and 40, respectively. Applicants note that these amendments are proposed solely in order to advance prosecution of the present Application, and Applicants expressly reserve the right to reassert claims 1, 21 and 37 as they appeared prior to the above amendments.

With respect to the recitations of claims 4, 24 and 40 (incorporated into claims 1, 21 and 37 above), the Examiner asserts that Mitchell et al. discloses:

defining a pointer [probe by field or path, termed ‘connection descriptor’] in a first table that references a second table [See Column 22, line 60 – Column 23, line 48]; and defining a pointer [‘semantic link’] in the second table [‘the table containing the connection descriptor’ (See Column 21, line

34 – Column 23, line 48)] that references that *instance* [EosMapFieldtoField (e.g., 103)] of the association class [EosMapElement] as claimed.

*Final Office Action*, p. 3, l. 21, through p. 4, l. 4 (square-bracketed material in original)

(emphasis added). The Examiner further argues that:

Applicant's statement [in the Amendment filed January 5, 2005] that, "the table referenced by the Examiner is used to initialize the semantic links" is simply incorrect, and unfounded in Mitchell's disclosure. The table is not used to "initialize" the semantic links. Instead, the table itself already **contains** the semantic links as clearly stated by Mitchell in column 22, line 25 et seq. (i.e. "There is an entry for each semantic link ...")

*Final Office Action*, p. 9, ll. 4-8 (emphasis in original). However, Applicants respectfully disagree with the Examiner's characterization of Mitchell et al.

The cited portion of Mitchell et al. refers to "the table containing the connection *descriptor*." Mitchell et al., col. 22, ll. 25-26. Thus, the table does not "contain" the semantic link *per se*, as asserted by the Examiner. Rather, it contains "the semantic link *description*." *Id.* at col. 22, ll. 27-28 (emphasis added). Contrary to the Examiner's arguments, this table *is* used to *initialize* the semantic links:

The edit function interprets the information in *the table* to first find the class for which the connection is stored, then find the named connection by looking it up in the table of connections in each class, then reading the specification for the connection out of the table and creating and *initializing* the proper data structures to set up the individual semantic links as described in the previously shown link.

Mitchell et al., col. 21, ll. 41-47 (emphasis added). Consequently, the "semantic link description" relied upon by the Examiner does not reference an *instance* of the EosMapElement class. Instead, it is a generic description of connections between classes of objects, that is used to initialize the semantic links.

For at least these reasons, Mitchell et al. fails to support the rejection of claims 1, 21 and 37 under 35 U.S.C. § 102(b). Accordingly, Applicants respectfully request that the rejection of these claims under 35 U.S.C. § 102(b) be withdrawn and the claims allowed.

***Claims 2, 5, 22, 25, 38 and 41***

Claims 2, 5, 22, 25, 38 and 41 depend, directly or indirectly, from one of claims 1, 21 and 37. As explained, the rejection of claims 1, 21 and 37 under 35 U.S.C. § 102(b) is not supported by Mitchell et al. Therefore, the rejection of claims 2, 5, 22, 25, 38 and 41 is likewise not supported by Mitchell et al. for at least the reasons given above, and Applicants respectfully request that the rejection of these claims be withdrawn and the claims allowed.

Moreover, as explained in the Amendment filed January 5, 2005, the member fRightSide described by Mitchell et al. does not reflect a relationship between the mapper 103 and an *instance* of the patron object 106, and is thus not used to determine a relationship between *instances*. Instead, it represents the field on which a probe is to be set when the semantic link is *initialized*. See Mitchell et al., col. 22, ll. 27-34, and col. 23, ll. 2-7. Therefore, Mitchell et al. does not teach “determining a relationship {between the first and second instances} include[ing]: collecting a reference [fRightSide] reflecting a relationship between the association [103] and the second instance [106] based on the pointer in the second table,” as asserted by the Examiner. See *Final Office Action*, p. 4, ll. 6-9 (square-bracketed material in original).

For at least these additional reasons, the rejection of claims 5, 25 and 41 is not supported by Mitchell et al. Accordingly, Applicants respectfully request that the rejection of these claims under 35 U.S.C. § 102(b) be withdrawn and the claims allowed.

***Claims 6, 26 and 42***

In the rejection of claims 6, 26 and 42, the Examiner asserts that Mitchell et al. teaches:

for *each class instance* ...

(i) creating a first level wrapper table [See Claim 4 above] including a pointer [probe] to a second level wrapper table [‘the table containing the connection descriptor’ (See Column 21, line 34 – Column 23, line 48)] associated with the association class; and

(ii) creating N [one entry for each mapper object present in the table] pointers [‘semantic links’] in the second level wrapper table [See above & Claim 4] that each references an *individual instance* [EosMapFieldToField (e.g. 103)] of the association class as claimed.

*Final Office Action*, p. 4, l. 21, through p. 5, l. 6 (square-bracketed material in original) (emphasis added). However, Applicants respectfully disagree.

As explained above with respect to claims 4, 24 and 40, the table relied upon in the rejection is not created “for *each instance*” of the patron object. Instead, the table contains a generic description of connections between *classes* of objects, rather than between individual instances of the class. See Mitchell et al., col. 21, ll. 41-47. For at least these reasons, the Examiner’s rejection of claims 6, 26 and 42 is not supported by

Mitchell et al. Accordingly, Applicants respectfully request that the rejection of these claims under 35 U.S.C. § 102(b) be withdrawn and the claims allowed.

***Claims 7, 8, 27, 28, 43 and 44***

Claims 7, 8, 27, 28, 43 and 44 depend, directly or indirectly, from one of claims 6, 26 and 42. As explained, the Examiner's rejections of claims 6, 26 and 42 lacks support in Mitchell et al. Therefore, the rejection of claims 7, 8, 27, 28, 43 and 44 likewise lacks support in Mitchell et al. for at least the same reasons given above with respect to claims 6, 26 and 42, and Applicants respectfully request that the rejection of these claims be withdrawn and the claims allowed.

***Claims 9, 10, 45 and 46***

Claims 9, 10, 45 and 46 contain recitations similar to those referenced above with respect to claims 6, 26 and 42, and the Examiner's rejection of claims 9, 10, 45 and 46 likewise lacks support in Mitchell et al. for reasons similar to those given above. Accordingly, Applicants respectfully request that the rejection of these claims under 35 U.S.C. § 102(b) be withdrawn and the claims allowed.

Further in regard to claims 10 and 46, the Examiner continues to assert that Mitchell et al. discloses "X instances [e.g. 104, 107] of a second association class [EosFieldElement] that *each reference* [See Fig. 1] *the class instance.*" *Final Office Action*, p. 5, ll. 19-21 (square-bracketed material in original) (emphasis added).

However, as pointed out in the Amendment filed January 5, 2005, the right and left side type elements 104 and 107 of Mitchell et al. are bound to *different* patron objects. See

Mitchell et al., FIG. 1. The Examiner failed to respond to this argument in the Final Office Action. Accordingly, Mitchell et al. does not support the Examiner's rejection of claims 10 and 46 for at least these additional reasons, and Applicants respectfully request that the rejection of these claims under 35 U.S.C. § 102(b) be withdrawn and the claims allowed.

***Claims 11, 29 and 47***

With respect to claims 11, 29 and 47, the Examiner continues to assert that Mitchell et al. teaches "receiving an association traversal request [due to update of or modification to an Patron Object] for a class instance [Patron Object (e.g. 102, 106)]; and performing an association traversal process ... [See Claims 1-5 above] as claimed." *Final Office Action*, p. 6, ll. 8-16 (square-bracketed material in original).

However, as explained in the Amendment filed January 5, 2005, Applicants can find no disclosure in Mitchell et al. (and the Examiner has pointed to none) that would equate the "firing" of a probe "due to update of or modification to a Patron Object" (see Mitchell et al., col. 14, ll. 8-43) with "an association traversal request for a class instance." Instead, the firing of the probe simply triggers mapper 103 to synchronize the probed fields. *Id.*

For at least these reasons, the rejection of claims 11, 29 and 47 is not supported by Mitchell et al. Accordingly, Applicants respectfully request that the rejection of these claims under 35 U.S.C. § 102(b) be withdrawn and the claims allowed.

***Claims 13, 31 and 49***

Claims 13, 31 and 49 depend from claims 11, 29 and 47, respectively. As explained, the Examiner's rejection of claims 11, 29 and 47 is not supported by Mitchell et al. Therefore, the rejection of claims 13, 31 and 49 likewise lacks support in Mitchell et al., and Applicants respectfully request that the rejection of these claims be withdrawn and the claims allowed.

***Claims 14-20, 32, 33 and 50-53***

Finally, the Examiner asserts that "claims 14-20 [and claims 32, 33 and 50-53] repeat limitations of claims 1-11 in various combinations" and thus rejects these claims "on substantially the same basis as one or more of claims 1-11 above." See *Final Office Action*, p. 6, ll. 20-22, and p. 7, ll. 4-9. However, Applicants respectfully disagree with the Examiner's characterization of these claims. Contrary to the Examiner's assertions, each of claims 14-20, 32, 33 and 50-53 contain recitations not present in any of claims 1-11.

For example, with respect to claims 18-20, Applicants can find no teaching of an "object manager" in Mitchell et al. and the Examiner has not shown *or even alleged* that Mitchell et al. discloses an object manager. Therefore, the rejection of claims 18-20 lacks *any* basis in the reference relied upon and should be withdrawn.

Absent an explanation of the Examiner's interpretation of how Mitchell et al. allegedly meets the recitations of claims 14-20, 32, 33 and 50-53, Applicants must necessarily speculate as to the basis of the Examiner's rejection and are therefore unable to make an informed decision regarding the prosecution of these claims.



Accordingly, Applicants respectfully request that the Examiner withdraw the finality of the Office Action dated May 5, 2005, and either provide detailed grounds of rejection for claims 14-20, 32, 33 and 50-53 in a new non-final Final Office Action or allow these claims.

### ***Conclusions***

Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing claims 1, 2, 5-11, 13-22, 25-29, 31-33, 37, 38, 41-47 and 49-53 in condition for allowance. Applicants submit that the proposed amendments of claims 1, 21 and 37 do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Furthermore, Applicants respectfully point out that the Final Office Action failed to respond to all of the Arguments presented in the Amendment filed January 5, 2005, and further presented new arguments as to the application of Mitchell et al. with respect to the pending claims. It is respectfully submitted that the entering of the Amendment would allow the Applicants to reply to the final rejections and place the application in condition for allowance.

Finally, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicants submit that this claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

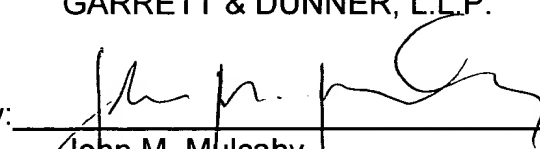
Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: July 5, 2005

By: \_\_\_\_\_

  
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